

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Christian R. Everdell and Memorandum of Law with exhibit and attachments, Samuel Bankman-Fried hereby moves through his counsel (i) to compel the Government pursuant to Rule 16 of the Federal Rules of Criminal Procedure to produce the documents specifically identified in Exhibit A to the subpoena attached hereto (the “Subpoena”), and (ii) in the alternative, for an order under Rule 17(c)(1) of the Federal Rules of Criminal Procedure authorizing his counsel to issue the Subpoena to the law firm of Fenwick & West LLP (“Fenwick”) directing Fenwick to produce these same documents to the defense by no later than June 20, 2023, or such other date as the Court may order.

Dated: May 30, 2023
New York, New York

Respectfully submitted,

/s/ Mark S. Cohen

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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2023, I served via Federal Express overnight delivery, pursuant to Federal Rule of Criminal Procedure 49 and Local Civil Rule 5.3 and Local Criminal Rule 1.1 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, the attached notice of motion upon the following non-party:

Fenwick & West LLP
c/o Nancy Hart, Esq.
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Christian R. Everdell